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January 8, 2025

Honorable Michael B. Kaplan  
United States Bankruptcy Court  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

***Re: In Re: Wayne Burt PTE LTD  
Case No. 24-19956-MBK***

Dear Judge Kaplan:

This law firm represents Vertiv Inc., Vertiv Capital, Inc. and Gnaritas, Inc. (“Vertiv”) in this matter. Vertiv submits this letter brief in lieu of a more formal brief in opposition to the debtor’s Motion to Compel Vertiv to turnover shares of Cetex Petrochemicals.

In opposition to the debtor’s Motion to Compel, Vertiv will rely upon the argument set forth in its Motion to Stay the Enforcement of the Order, dkt #50, and upon any argument set forth in its Reply to any opposition submitted by the debtor to its Motion to Stay Enforcement of the Order.

Thank you for your kind assistance and cooperation in this regard.

Respectfully submitted,

LEWIS & FORREY, L.L.C.

***DAVID R. FORREY***

David R. Forrey

Enclosures

C: Dan Moss, Esq. w/enclosures

David Torborg, Esq. w/enclosures

Paul DeFillippo, Esq. w/enclosures

James Lawlor, Esq. w/enclosures